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October 26, 2022

Via ECF

Hon. Christine P. O'Hearn
United States District Judge
District of New Jersey
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *United States v. James Patten, et al.,*
22-cr-00643-CPO

Dear Judge O'Hearn:

We represent Defendant James Patten in the above-referenced case. We write to respectfully request that Your Honor modify the Court's Order (ECF Doc. No. 15) regarding Mr. Patten's conditions for release to allow Mr. Patten to travel throughout the continental United States, as recommended by Pretrial Services in this District. The Government consents to this request.

Upon Mr. Patten's arrest in North Carolina, Magistrate Judge L. Patrick Auld, Middle District of North Carolina, restricted Mr. Patten's travel to the Middle District of North Carolina and the District of New Jersey, unless Mr. Patten obtained prior approval from his Probation Supervising Officer (ECF Doc. No. 9, at 8). Counsel subsequently obtained permission from Probation Officer James Long, Middle District of North Carolina, for Mr. Patten to travel to New York as well.

After interviewing Mr. Patten, Pretrial Services in this District recommended that Mr. Patten's travel restrictions be expanded to the continental United States. And during Mr. Patten's initial appearance before Your Honor on October 11, 2022, counsel understood that Your Honor agreed with Pretrial Services' recommendation in this regard. However, the Court's Order Setting Conditions for Release (ECF Doc. No. 15) appears to reinstate Judge Auld's prior travel restrictions.

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Accordingly, we respectfully request that Your Honor issue an Order permitting Mr. Patten to travel throughout the continental United States. We are available at the Court's convenience if Your Honor has any questions or concerns.

Respectfully submitted,

/s/ Adam K. Brody

Ira Lee Sorkin
Adam K. Brody

Cc: Counsel of record

Via ECF